

Miller-Levy, Brooke <bmillerlevy@usbr.gov>

FW: CVP Cost Allocation

1 message

Larry Bauman <lbauman@cvpwater.org>

Fri, Sep 27, 2013 at 10:15 AM

To: Brooke Miller-Levy <BMillerLevy@usbr.gov>Cc: Craig Stroh <cstroh@usbr.gov>, Lynn Hurley <lhurley@valleywater.org>

Hi Brooke –

I meant to bring this matter up at our September 20th FAC meeting, but just forgot to. You may already have discussed this with Craig and have this on your to do list but, if not, would you please add it. Thanks.

Larry

From: STROH, CRAIG [mailto:cstroh@usbr.gov]**Sent:** Friday, August 30, 2013 12:39 PM**To:** Larry Bauman**Subject:** Re: CVP Cost Allocation

Larry,

I do not have a copy of any written documentation. I think we should pursue the matter further and pose the question again to CVO so we will have something more current.

Craig

On Fri, Aug 30, 2013 at 10:48 AM, Larry Bauman <lbauman@cvpwater.org> wrote:

Hi Craig –

I hope that this message finds you doing well.

I'm following up on your last reply (below) and was wondering if you have a copy of the study that CVO and Resources Management did last time to support the determination that the CVP incurred no extra costs in meeting standards above those in D-1485. If so, can you send me a copy.

Thanks and have a nice, three day weekend!

Larry

From: STROH, CRAIG [mailto:cstroh@usbr.gov]

Sent: Thursday, August 22, 2013 11:44 AM

To: Larry Bauman

Subject: Re: CVP Cost Allocation

Larry,

I am aware of the letter. Section 102 of P. L. 99-546 addresses the issue of the costs of Delta water quality standards above those in D-1485. The costs in that section are costs incurred by Reclamation. At some time in the past, it was determined that the CVP incurred no extra costs in meeting standards above those in D-1485.

As a part of the current allocation effort, we will again request a study (from CVO and resources management) to determine if Reclamation incurs any additional costs in meeting the standards above D-1485.

Craig

On Thu, Aug 22, 2013 at 11:00 AM, Larry Bauman <lbauman@cvpwater.org> wrote:

Hi Craig -

Thanks for your quick response. Attached is a copy of two letters, part of which direct attention to the water quality standards issue (specifically starting on pg. 3 of the attachment to March 21, 2006 letter). These letters were referenced and sent to the CVP Project Manager at the start of the new study effort so you may have already seen them. In 2006, hydrologic modeling identified an average annual CVP delivery impact of approximately 100,000 acre-feet. Wouldn't that acre-feet reduction alone create a costs impact above D-1485 water standards?

Can you tell me how and what basis Reclamation is using in making the determination that there have been no cost increases identified in meeting water standards above D-1485? Has this already been considered and evaluated when Reclamation looked at the "Water Supply" purpose? Will it be reevaluated in the review and roll out of the "Water Quality" purpose?

Larry

From: STROH, CRAIG [mailto:cstroh@usbr.gov]

Sent: Wednesday, August 21, 2013 1:23 PM

To: Larry Bauman

Subject: Re: CVP Cost Allocation

Larry,

Reclamation adheres to PL 99-546 and the nonreimbursability of the costs of achieving a water quality standard above D-1485. However, no increases in costs (construction or operations) for Reclamation have been identified in meeting water standards above D-1485.

New Melones has an allocation of costs to water quality because the 1962 authorizing act provided for space in the reservoir for downstream water quality control. That control is considered an area-wide benefit and cost allocated (by the Corps) to water quality is nonreimbursable by virtue of P.L. 87-88 (Amendment to the Federal Water Pollution Control Act.)

Craig

On Wed, Aug 21, 2013 at 10:59 AM, Larry Bauman <lbauman@cvpwater.org> wrote:

Hi Craig –

It was good seeing you at the August 9th public meeting. I have a question for you regarding PL 99-546, specifically Section 102 which, in part, provides: The costs associated with providing Central Valley project water

supplies for the purpose of salinity control and for complying with State water quality standards identified in exhibit A of the 'Agreement Between the United States of America and the Department of Water Resources of the State of California for Coordinated Operation of the Central Valley Project and the State Water Project' dated May 20, 1985, shall be allocated among the project purposes and shall be reimbursed in accordance with existing Reclamation law and policy. The costs of providing water for salinity control and for complying with State water quality standards above those standards identified in the previous sentence shall be nonreimbursable.

Do you know if Reclamation adheres to this cost allocation for any of their divisions/projects? My initial thought was that Reclamation does not, but then I got to thinking about New Melones and was wondering if they were an exception.

Thanks in advance for your help and I look forward to your reply.

Larry